



U.S. Department of Justice

*Civil Division
Federal Programs Branch*

*1100 L St NW
Washington, D.C. 20012*

May 30, 2025

BY ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15C
New York, NY 10007

Re: *MTA, et al. v. Duffy, et al.*, No. 25 Civ. 1413 (LJL)

Dear Judge Liman:

We write respectfully on behalf of Defendants, Plaintiffs Metropolitan Transit Authority and Triborough Bridge and Tunnel Authority, and Intervenor-Plaintiffs New York State Department of Transportation to request a three-day extension of the time for Defendants to respond to the operative complaints to June 6, 2025. Good cause exists for this request.

The parties are conferring with their respective clients and are in the process of discussing in good faith ways to expedite this proceeding. Defendants represent that they require additional time to consider how to expedite this proceeding and whether they will appeal or otherwise seek relief from the Court's May 28 order entering a preliminary injunction. The parties plan to meet and confer regarding proposals to expedite this proceeding on Monday, June 2. These efforts have diverted resources from responding to the operative complaints, and a potential change in the case schedule may impact how, or if, Defendants respond to the operative complaints.

This extension will not affect any other deadlines in the case.

Counsel for Defendants conferred with Plaintiffs' counsel via email on May 30, 2025. Plaintiffs MTA and TBTA and Intervenor-Plaintiffs NYSDOT agreed to join this letter motion to the Court based on Defendants' above representations about expediting the proceeding. Intervenor-Plaintiffs New York City Department of Transportation, Riders Alliance, and Sierra Club consent to the extension.

Respectfully,

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cc: All Counsel of Record (via ECF)